

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

DOCKET NO. 15-CR-00077-JL

JUAN PICHARDO MENDEZ

MOTION, PURSUANT TO 18 U.S.C. 3145(b),
TO REVIEW DEFENDANT'S PRE-TRIAL DETENTION

NOW COMES the defendant, Juan Pichardo Mendez, by and through counsel, Paul J. Garrity, and respectfully request that this Court review the Defendant's Detention status with regard to the above entitled matter.

In support of this motion, the defendant states as follows:

1. The Defendant is currently detained subsequent to detention hearing held in this Court on June 29 and June 30, 2015
2. At the detention hearing, the Defendant proffered that he be released into the third party custody of his ex-girlfriend and that he could reside with her and their children
3. This Court (Johnstone, MJ) found that this proffer and other information provided by the Defendant did not rebut the statutory presumption and ordered the Defendant detained pending trial.
4. The Defendant now proffers that he has a close friend, Yadira Solano, who would be willing to serve as a third party custodian and allow the Defendant to live with her and her children. The Defendant submits that Mr. Solano resides in New Hampshire, has a stable long time job in New Hampshire and would meet all requirements of an appropriate third party custodian.
5. That the Government does object to this Motion.

WHEREFORE, the defendant respectfully requests that this Court grant this Motion to review the Defendant's Pre-Trial Detention status.

Respectfully submitted,
Juan Pichardo Mendez,
By His Attorney,

DATE: August 5, 2015

/s/ Paul J. Garrity
Paul J. Garrity
Bar #905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, hereby certify that on this 5th day of August, 2015 a copy of the within Motion to Review Defendant's Pre-Trial Detention has been filed to the U.S. Attorney's Office and all parties of record and mailed, postage prepaid, to Juan Pichardo Mendez.

/s/ Paul J. Garrity